

**IN THE UNITED STATE DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

PAUL GREEN

Plaintiff,

v.

DALLAS COUNTY SCHOOLS,

Defendants.

§
§
§
§
§
§
§
§
§

CIVIL ACTION NO.

3:12-CV-664-L

STIPULATION OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE

Plaintiff and Defendant, through their undersigned counsel, file this Stipulation of Voluntary Dismissal Without Prejudice pursuant to Rule 41(a)(1)(ii) for the Federal Rules of Civil Procedure.

Plaintiff moves to dismiss all allegations in this lawsuit against defendant WITHOUT PREJUDICE to pursue state law claims in state court in Dallas County. Plaintiff and Defendant stipulate that Plaintiff is abandoning any current or potential federal causes of action and seeks only to pursue his claims in state court in Dallas County.

Plaintiff and Defendant also stipulate that any discovery exchanged to date and due after the filing of this stipulation will be fully admissible, subject to any objections raised in the discovery, in any subsequent lawsuit filed in state court. Plaintiff and Defendant stipulate further that Plaintiff already has served Defendant with twenty-five interrogatories and will not serve any additional interrogatories in pursuing his claims in state court in Dallas County.

Respectfully submitted,

/s/ Matthew R. Scott

MATTHEW R. SCOTT

Texas Bar No. 00794613

JOE KENDALL

Texas Bar No. 11260700

JAMIE J. MCKEY

Texas Bar No. 24045262

THE KENDALL LAW GROUP

3232 McKinney Avenue, Suite 700

Dallas, Texas 75204

214-744-3000 / 214-744-3015 (Facsimile)

PAUL F. WRIGHT

Texas Bar No. 24008308

DANYA FULLER

Texas Bar No. 24059786

The Wright Firm, L.L.P.

8150 N. Central Expressway, Suite 775

Dallas, Texas 75206

469-635-6909 / 214-780-9797 (Facsimile)

ATTORNEYS FOR PLAINTIFF

and

/s/ Meredith Prykryl Walker

MEREDITH PRYKRYL WALKER

Texas Bar No. 24056487

**WALSH, ANDERSON, GALLEGOS,
GREEN & TREVIÑO, P.C.**

909 Hidden Ridge, Suite 410

Irving, Texas 75038

214-574-8800 / 214-574-8801 (Facsimile)

ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I certify that a copy of this document was forwarded to the following counsel of record via the Court's ECF system on August 29, 2012.

Meredith Prykryl Walker
Walsh, Anderson, Gallegos,
Green & Treviño, P.C.
909 Hidden Ridge, Suite 410
Irving, Texas 75038
Attorneys for Defendants

/s/ Matthew R. Scott

MATTHEW R. SCOTT